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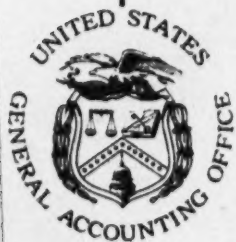
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ABSTRACT

The objective of this government document is to report on the Bureau of Indian Affairs' (BIA) opportunity to close the educational gap between Indians and other Americans by raising the academic achievement level of the Indians to the national average by 1976. Findings of this review of management methods used by the BIA revealed, for example, that the BIA should develop a management information system to assist the program manager with such tasks as assessing students' educational needs, devising strategies for overcoming problems, measuring progress toward stated goals, and tooling up for provision of program-oriented financial management reports. Other needs that were identified include improvement of students' English communication skills, implementation of special education programs and professional counseling services, provision of substitute teachers, and implementation of testing programs for securing academic aptitude and achievement data. Recommendations and considerations to the Secretary of Interior and the Congress are presented in addition to the findings of the review. (FF)



REPORT TO THE CONGRESS

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Opportunity To Improve Indian Education In Schools Operated By The Bureau Of Indian Affairs B-161468

Department of the Interior

BY THE COMPTROLLER GENERAL
OF THE UNITED STATES

APRIL 28, 1972



COMPTROLLER GENERAL OF THE UNITED STATES
WASHINGTON, D.C. 20548

B-161468

To the President of the Senate and the
Speaker of the House of Representatives

This is our report on the Department of the Interior's opportunity to improve Indian education in schools operated by the Bureau of Indian Affairs.

Our review was made pursuant to the Budget and Accounting Act, 1921 (31 U.S.C. 53), and the Accounting and Auditing Act of 1950 (31 U.S.C. 67).

Copies of this report are being sent to the Director, Office of Management and Budget; the Secretary of the Interior; and the Executive Director, National Council on Indian Opportunity.

James B. Stacks

Comptroller General
of the United States

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C o n t e n t s

	<u>Page</u>
DIGEST	1
CHAPTER	
1 INTRODUCTION	5
Overall perspective	6
Background	7
2 OPPORTUNITIES FOR IMPROVING INDIAN EDUCATION	9
Need to organize programs around established goals for Indian education	11
Need for training to compensate for English communication handicaps	12
Need for special education programs	15
Need for professional counseling services in BIA schools	16
Need to obtain substitute teachers	19
Need to improve BIA's management information system	20
Need for academic aptitude and achievement data	20
Need for program-oriented financial management reports	22
3 CONCLUSIONS AND RECOMMENDATIONS	25
Conclusions	25
Recommendations to the Secretary of the Interior	26
Matters for consideration by the Congress	27
4 AGENCY COMMENTS AND GAO EVALUATION	29
5 SCOPE OF REVIEW	32
APPENDIX	
I Letter dated March 16, 1972, from the Director of Survey and Review, Department of the Interior, to the General Accounting Office	33

APPENDIX

Page

- II Principal officials of the Department of
the Interior responsible for administra-
tion of activities discussed in this re-
port

37

ABBREVIATIONS

BIA Bureau of Indian Affairs
GAO General Accounting Office

COMPTROLLER GENERAL'S
REPORT TO THE CONGRESS

OPPORTUNITY TO IMPROVE
INDIAN EDUCATION IN
SCHOOLS OPERATED BY
THE BUREAU OF INDIAN AFFAIRS
Department of the Interior
B-161468

D I G E S T

WHY THE REVIEW WAS MADE

American Indians and Alaska Natives are considered to be among this country's most disadvantaged citizens, whether the scale of measurement is employment, income, housing, health, or education. It generally is recognized by Indian leaders and Government officials that education is a key element in the ultimate solution of the problems that these disadvantaged citizens face.

In recent years both the President and the Congress have focused considerable attention on the continuing problems which have beset Indian education. Senate Report 91-501, entitled "Indian Education: A National Tragedy--A National Challenge," outlined a number of serious inadequacies in the Bureau of Indian Affairs' (BIA) education program and recommended that the Federal Government set specific goals for rapid attainment of equal educational opportunity for Indian children, including parity of achievement level of Indian high school students with national norms.

During the 5-year period ended June 30, 1971, BIA expended about \$500 million to operate Federal schools and dormitories having a total annual enrollment of about 50,000 Indian children. Although complete and accurate data was not available, BIA estimated, on the basis of limited data available in 1968, that Indians graduating from BIA high schools generally had only about a ninth-grade education as measured by standardized academic-achievement tests.

The General Accounting Office (GAO) made this review to evaluate the management methods used by BIA in meeting the goals set for education of Indian children in BIA-operated schools.

FINDINGS AND CONCLUSIONS

The major goal of BIA's education program is to close the education gap between Indians and other Americans by raising the academic-achievement level of Indian students up to the national average by 1976. It appears that relatively little progress has been made toward achieving this goal. (See p. 9.)

In fact BIA's education programs have not been designed to achieve this goal. Officials at five of 12 schools and at one of three area offices visited told GAO that they were not even aware of the goal. Officials at the remaining schools and area offices stated that they had not made a specific effort to design their programs to reach this goal and had not received any guidelines or instructions concerning it from the BIA central office. (See p. 11.)

Certain factors which adversely affected students' ability to achieve at the national average were not fully dealt with in the established school programs. For example:

- Inability to communicate effectively in the English language generally was recognized as a primary restraint to normal educational progress. Standardized achievement tests indicated that almost all students in the schools GAO visited had communication skills deficiencies. GAO noted, however, that the schools generally did not have adequate programs to deal with this problem. (See pp. 12 and 13.)
- BIA officials estimated that the number of Indian children in their schools needing special education for physical, sensory, mental, or emotional handicaps was at least double that normally found in public schools and might be as high as 50 percent of total enrollment in boarding schools off the reservations. Six of the 12 schools visited by GAO, however, had not established special education programs, and some of the special education programs which had been established at several other schools were not adequate. (See pp. 15 and 16.)
- BIA's guidance programs generally have emphasized dormitory administration in boarding schools and have not provided Indian students with a broad range of professional counseling services, including academic counseling. The counselors' activities were concerned primarily with social and personal problems of the students. (See pp. 16 to 18.)
- Of the 12 schools visited, 10 did not have adequate provisions for obtaining substitute teachers to assume responsibility for classes when regular teachers were absent. (See p. 19.)

BIA did not have an effective management information system which would provide education program officials with data necessary for identifying educational needs of Indian children, designing programs and activities for accomplishing educational goals, allocating resources to these programs, and evaluating the costs and benefits in relation to the educational goals. (See pp. 20 to 24.)

RECOMMENDATIONS OR SUGGESTIONS

The Department of the Interior should require the Commissioner of Indian Affairs to:

- Clearly apprise all operating levels of the goal of reaching a level of academic achievement for Indian students equal to the national average and the date by which it is to be accomplished.
- Identify and assign priorities for dealing with all critical factors known to impede progress toward accomplishment of that goal.
- Develop a comprehensive educational program which is designed specifically to overcome the factors which impede progress in meeting the goal and which is flexible enough to meet the needs of students in all BIA schools.
- Establish periodic milestones, such as the amount of improvement in the academic-achievement level necessary at the end of each successive year, to accomplish the established goal.
- Periodically evaluate program results on the basis of these predetermined milestones to allow timely redirections of effort as may be necessary.
- Develop a management information system providing:
 1. Meaningful and comprehensive information on the academic aptitude and achievement levels of students in the BIA school system.
 2. Program-oriented financial management reports geared toward the management needs of BIA education program officials. (See pp. 26 and 27.)

AGENCY ACTIONS AND UNRESOLVED ISSUES

The Department of the Interior stated that it was in general accord with GAO's findings and that GAO's conclusions and recommendations would constructively support BIA's efforts to improve its education program.

The Department stated that it would be normal to expect that from 5 to 10 years would be required to statistically prove any increased effectiveness through student test results. The Department noted that GAO had not given due cognizance to departmental and congressional commitments and efforts to improve educational opportunity for the American Indian.

GAO agrees that it would have been desirable to obtain student academic-achievement data covering several years. Such data was not available, however, and, by necessity, GAO's evaluation of progress achieved by BIA was limited to available data.

The Department's comments on GAO's recommendations are discussed below.

- A task force was established in March 1971 to review the goals and objectives of BIA's education program and the necessary organizational changes to achieve them. The Department did not indicate, however,

what action would be taken to apprise all operating levels of the goal of reaching a level of academic achievement equal to the national average and the date by which it was to be accomplished.

- The Department outlined a number of steps to be implemented in fiscal year 1973 for identifying and assigning priorities for dealing with all critical factors known to impede progress toward accomplishment of its goal.
- Concerning GAO's recommendation for development of a comprehensive education program that would meet the needs of all students in BIA schools, the Department stated that actions were being taken to upgrade the ability of school personnel to deal with the special nature of the students served. GAO believes that, although these actions should help to improve BIA's education program, action also must be taken to ensure that the special needs of all students are identified and met.
- Regarding GAO's recommendations for establishment of milestones and for periodic evaluation of program results, the Department stated that these exercises were impractical since the BIA goal must be tempered by the reality of Indian self-determination, the special nature of the students served, and the availability of funds. GAO believes that effective management requires the development of an appropriate strategy for meeting established goals and the periodic evaluation of progress toward meeting these goals.
- Concerning GAO's recommendation for development of an education management information system, the Department outlined various activities which would be undertaken to design and implement such a system. GAO believes that effective use of information provided by the system should assist BIA in managing its schools. (See pp. 29 to 31.)

MATTERS FOR CONSIDERATION BY THE CONGRESS

In view of the concern which has been expressed by the President and by members of the Congress regarding the quality of Indian education, the Congress may wish to consider enacting legislation requiring BIA to furnish certain specific information as suggested in this report, which the Congress could use to evaluate the progress being made in improving Indian education. (See pp. 27 and 28.)

CHAPTER 1

INTRODUCTION

American Indians and Alaska Natives (hereinafter referred to as Indians) are considered to be among this country's most disadvantaged citizens, whether the scale of measurement is employment, income, housing, health, or education. It generally is recognized by various Indian leaders and Government officials that education is one of the key elements in the ultimate solution of the complex problems faced by these disadvantaged citizens.

In recent years both the President and the Congress have focused considerable attention on the continuing problems which have beset Indian education. In a July 1970 message to the Congress, the President stated that one of the saddest aspects of Indian life was the low quality of Indian education.

In November 1969 the Special Subcommittee on Indian Education, Senate Committee on Labor and Public Welfare, concluded a 2-year investigation by issuing Senate Report 91-501, entitled "Indian Education: A National Tragedy-- A National Challenge." The Subcommittee outlined in its report a number of serious inadequacies in the education programs of the Bureau of Indian Affairs and concluded that "The present organization and administration of the BIA school system could hardly be worse."

The Subcommittee recommended that the Federal Government commit itself to providing Indians with an excellent education, including maximum Indian participation in, and control of, Indian education programs. In addition, the Subcommittee recommended that the Federal Government set specific goals for rapid attainment of equal educational opportunity for Indian children, including parity of achievement level of Indian high school students with national norms.

Because of the national interest in Indian education which had been expressed by the President and the Congress, the General Accounting Office undertook a review of the

management of the BIA school system. Our review was concerned primarily with evaluating management methods used by BIA to meet the goals set for education of Indian children in BIA-operated schools.

OVERALL PERSPECTIVE

Each administration since 1960 has announced a policy calling for full participation by Indians in American life and a standard of living and an education equal to the national average.

BIA established certain educational goals in 1963, which were directed specifically toward closing the education gap between Indians and non-Indians by 1970. Except for a change in the target date, these goals have continued into the 1970's. The goals outlined in BIA's fiscal years 1971 and 1972 Program Memorandums,¹ dated June 1969 and May 1970, respectively, are that (1) 90 percent of all Indian youth graduate from high school, (2) by 1976 the achievement level of Indian students at least equal that for non-Indian youth, (3) 50 percent of the graduates enter college, and (4) the remaining 50 percent be either employed or enrolled in technical training.

The BIA goal of raising the academic-achievement level of Indian students at least up to that attained by non-Indian students appears to be consistent with the educational goals of the Indians themselves. For example, a private firm conducting a study of Indian education in 1969 reported that Indian students and parents, school administrators, teachers, and educational consultants were in substantial agreement that the goal of Indian education should be equal opportunity for Indian and non-Indian Americans. The study report further defined this goal as academic achievement for Indian high school and college graduates equal to that of non-Indians.

¹BIA program memorandums are documents which present statements of major program issues requiring decisions in the current budget cycle and which have implications in terms of either present or future costs or the direction of a program or group of programs.

This goal was articulated by an Indian school board member during an April 1969 education conference at the Fort Apache Reservation, Arizona, as follows:

"Our ultimate goal should be to educate our children so that their qualifications for any open position will be on an equal par with, if not better than, the non-Indians. This is the goal we should strive for."

A study of Indian education conducted by a former BIA Deputy Assistant Commissioner for Education under a grant by the Office of Education, Department of Health, Education, and Welfare, focused on the 1960's and the accomplishments during that decade. That study indicated that BIA had made progress in increasing the percentage of Indian children enrolled in school and in increasing the number of Indian high school graduates. In its 1972 Program Memorandum, however, BIA estimated that the academic-achievement level of Indian children graduating from BIA high schools was 3.3 years below the national average. We could not readily ascertain the reliability of this estimate because BIA does not accumulate achievement test data from its schools.

BACKGROUND

During fiscal year 1971 about 200,000 Indian children were enrolled in elementary and secondary schools. Those schools included Federal, public, private, and mission facilities. About 50,000 of these students were enrolled in 200 BIA-operated schools. Also BIA operated 19 dormitories for about 4,000 Indian children attending public schools and provided funding for five schools operated by Indian school boards under contract with BIA. In addition, BIA operated two postsecondary schools having a total enrollment of about 1,300 students.

The program for the education of Indian students in these federally operated or federally funded schools is administered by BIA's central office in Washington, D.C., and its 11 area and 76 agency offices.

During fiscal year 1971 BIA's appropriation for educational assistance, facilities, and services totaled

\$146.2 million, of which \$118.6 million was expended in the operation of the Federal facilities discussed above, including the five schools operated by Indian school boards. The remaining \$27.6 million was expended for assistance to pupils in non-Federal schools, adult education and community development. Also in fiscal year 1971 BIA expended \$13 million received through other Federal programs, such as the program funded by the Elementary and Secondary Education Act of 1965 (20 U.S.C. 241a) administered by the Office of Education. These funds were for special education programs, such as remedial reading.

During the 5-year period ended June 30, 1971, BIA expended about \$500 million, including about \$50 million received through other Federal programs, to operate Federal schools and dormitories having a total average annual enrollment of about 50,000 students.

CHAPTER 2

OPPORTUNITIES FOR IMPROVING INDIAN EDUCATION

The major goal of BIA's education programs is to close the education gap between Indians and non-Indians by raising the academic-achievement level of Indian students up to the national average by 1976. It appears, however, that BIA has made relatively little progress toward attaining this goal, largely because BIA has not adequately communicated this goal to its area offices and schools and has not developed a specific plan for identifying and overcoming obstacles to, or for measuring progress toward, the accomplishment of this goal.

Our review of BIA records showed that they did not provide sufficient information to determine the actual progress that had been made toward raising the academic-achievement level of Indian children. As discussed in more detail on page 20, the formulation of academic achievement-testing programs was left to the discretion of the education officials at each of BIA's 11 area offices and the established testing programs differed from area to area. Also individual schools within the areas often did not follow the established programs. Further the results of tests that were administered at the schools were not compiled and evaluated on a national basis at the BIA central office. As a result the central office did not have the comprehensive academic-achievement data needed for comparing progress in attaining the goal of the education program on a school-to-school and year-to-year basis.

Academic-achievement data that was available at the 12 schools we visited showed relatively little evidence of progress from year to year. For example, the following table shows the gap between the national average and the average achievement level of Indian students at three elementary schools in the Phoenix Area, as measured by California

Achievement Tests¹ administered in the spring of 1970 and again in the spring of 1971.

Year in which tested	Achievement gap							
	Grade							
	<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>	<u>6</u>	<u>7</u>	<u>8</u>
(years below national average)								
1970	0.7	0.8	1.4	1.2	1.3	1.6	1.3	1.9
1971	0.9	1.4	0.5	1.5	1.4	1.8	1.7	2.0

As shown above the gap between the national average and the average achievement level of Indian students shows a reduction in only the third grade.

The results of California Achievement Tests administered to students at three off-reservation secondary boarding schools located in the Navajo, Phoenix, and Juneau Areas also disclosed that there had been little evidence of progress, as shown below.

Year in which tested	Achievement gap											
	High school A				High school B				High school C			
	Grade				Grade				Grade			
	<u>9</u>	<u>10</u>	<u>11</u>	<u>12</u>	<u>9</u>	<u>10</u>	<u>11</u>	<u>12</u>	<u>9</u>	<u>10</u>	<u>11</u>	<u>12</u>
(years below national average)												
1970	3.3	3.8	4.6	5.3	1.8	2.5	2.7	3.6	0.6	1.2	1.1	1.6
1971	3.5	3.7	4.5	5.3	2.9	2.8	3.4	4.4	0.7	1.3	1.9	2.1

We discussed the above academic-achievement data with various education consultants, all of whom agreed that it showed that there had been little evidence of progress.

¹The California Achievement Test is one of a number of standardized tests used by educators in elementary and secondary schools to measure the academic-achievement levels of their students. Other standardized achievement tests used in BIA schools we visited included the Metropolitan Achievement Test and the Stanford Achievement Test.

NEED TO ORGANIZE PROGRAMS AROUND
ESTABLISHED GOALS FOR INDIAN EDUCATION

We found that BIA had not developed a specific plan to accomplish its goal of raising the academic-achievement level of Indian students up to the national average. Although the goal had been established and included in BIA's annual program memorandums, BIA did not plan and organize its education programs to achieve it.

Officials at BIA's central office and at the three area offices and 12 schools visited agreed that the education programs were not designed to reach the goal of raising the achievement level up to the national average by 1976. In fact officials at five schools and at one area office told us that they were not even aware of this goal. Officials at the seven other schools and two area offices told us that they had heard of the goal. They said, however, that they had not made a specific effort to design their programs to reach this goal because they had not been officially notified of it and had not received any guidelines or instructions from the central office concerning it.

The educational goals set forth in BIA's Manual, which was furnished to the schools and area offices, dated back to 1951 and were very general. These dealt primarily with such matters as physical, mental and moral development; citizenship; and health habits. The goals did not include closing the academic-achievement gap.

School officials cited a number of matters which had an adverse effect on the quality of education provided to children in BIA schools. These matters included the need for compensatory training in English communication skills, special education programs, professional counseling services, and substitute teachers. These matters, which are discussed below, are not intended to represent all the factors which have an impact on the quality of Indian education; instead, they are intended to illustrate that BIA has not organized its education program to accomplish its goal.

Need for training to compensate for
English communication handicaps

The importance of basic communications skills is stressed in the publication "Education: An Answer to Poverty," which was developed jointly by the Office of Education and the Office of Economic Opportunity and which points out that:

"*** reading and the development of language skills are the chief foundations of knowledge. Without them, all later schooling is built as though on quicksand and soon collapses."

Officials at the 12 schools we visited told us that the inability of Indian students to communicate effectively in English was a primary restraint to their achieving at the national average.

At one of the schools we visited, it had been determined that Apache was the predominant language in the students' homes; a survey of 32 homes had revealed only one case in which English was spoken in the home. The problem was complicated further by the students' isolation from any culture other than their own. Thus it was difficult for them to visualize a need for learning English. The survey showed that the students lived 43 miles from the nearest non-Indian community, that about 50 percent had no adequate means of transportation, that fewer than 20 percent had television, that an equally small percentage had radios, that only 4 percent had telephones, and that there was no local newspaper. The entire student body (pre-first through eighth grade) at this school was deficient in English communication skills.

Although the standardized achievement tests at the 12 schools we visited indicated that about 95 percent of the students were deficient in English communication skills, only one of these schools had established what the school principal considered to be an adequate compensatory training program to overcome the students' deficiencies.

Nine other schools had established compensatory communication training programs. These programs were often

referred to as reading laboratories and involved the use of various types of special audio-visual equipment, as illustrated by the photographs on page 14. These programs, however, usually were funded through Office of Education grants under the Elementary and Secondary Education Act of 1965, which are restricted by law to a limited number of students. For example, only about 120 students were enrolled in one high school's remedial reading program. Of the 425 students tested at that school, 409 had reading scores below the national average, including 382 who were 1 year or more below the average. This remedial reading program was designed, however, to bring students up to only the sixth-grade level. As a result many students were trying to cope with regular high school subjects, such as history and science, although their ability to read was substantially below the high school level.

The principal at the school which had established what he considered to be an adequate compensatory English communications training program stated that the program was designed specifically around the students' needs as identified by the teachers and through analysis of standardized achievement test results. Each student spent one half of each day in English language instruction. In conjunction with this, all other courses were designed to reinforce the students' skill in English communication.

The principal said that he believed that the program provided students with a firm base in English communication skills without compromising other course work necessary for their development. Although the program was only in its first year of operation, the principal was of the view that students could raise their overall achievement level up to the national average within 5 years of entering the program.

Need for special education programs

Officials at the schools we visited told us that special education programs were needed at their schools for certain students with physical, sensory, mental, or emotional handicaps. Little or no data, however, was available concerning the extent of these handicaps and the specific types of special education needed.

One BIA official estimated that the number of Indian children in BIA schools needing special education was at least double that normally found in public schools. Another BIA official estimated that as many as 50 percent of the students enrolled in BIA off-reservation boarding schools needed some form of special education due to poor early childhood health care, malnutrition, and social conditions on the reservation.

Of the 12 schools visited, six had not established any special education programs. Officials at several of the schools which did have special education programs told us that the programs were not adequate. For example, one of the established programs could handle only 18 of about 75 students who had been identified by teachers as needing special education. The special education teacher said that undoubtedly all students needing special education had not been identified.

Information obtained at one off-reservation secondary boarding school which did not have a special education program indicated that a large number of handicapped students at the school needed special education. We noted that one of the criteria under which students could be enrolled at this school was unusual social behavior too difficult to be solved at home or through existing community facilities. A survey by a psychologist showed that more than one half of the students had been enrolled on that basis. Randomly selected standardized test results at this school showed that students' academic-achievement scores generally were substantially below the national average in all subject areas tested, although their intelligence scores ranged from "above normal" to no lower than "dull normal."

The Chief of the Division of Special Education, California Department of Education, told us that, on the basis of the above information, it appeared that a number of students at this school might be educationally handicapped--students who were not mentally retarded but who were hindered in academic achievement by learning or behavioral disorders caused by emotional disturbances--and therefore might be in need of special education. He added that, in California public schools, such educationally handicapped students were handled generally by special full- or part-time classes or through individual tutoring.

Need for professional counseling services
in BIA schools

Although 11 of the 12 schools we visited had counselors, the counselors' efforts were concerned primarily with social and personal problems of the students.

BIA officials told us that historically their guidance programs were directed toward dormitory administration in boarding schools rather than providing a broad range of professional counseling services.

According to the American Personnel and Guidance Association, a national association of professional guidance and counseling personnel, some of the major functions of professional counselors in elementary and secondary schools include:

- Planning and developing the guidance program.
- Counseling individuals and small groups.
- Appraising students, including accumulating and interpreting such information as standardized test results and academic records, and identifying students having special abilities and/or needs.
- Assisting students in relating their interests, aptitudes, and abilities to current and future educational and occupational opportunities and requirements.

- Consulting with school administrators and members of the faculty relative to the curriculum which will meet the abilities, interests, and needs of the students.
- Placing students in appropriate school subjects and courses of study.
- Referring students to other pupil-personnel-services specialists.
- Meeting with students' parents.

We found, however, that (1) at 10 of the 12 schools visited by us, the counselors did not make use of the results of standardized achievement tests to identify student and curriculum needs, (2) at nine schools they did not participate in the placement of students in courses of study, and (3) at eight schools they were not involved in developing the curriculum.

Some of the above-mentioned functions of counselors were being performed in varying degrees by other school personnel. For example, at one off-reservation boarding school, the placement of students in courses of study was done by the academic department head on the basis of the State-approved curriculum for public schools. He told us that such tools as standardized academic aptitude and achievement test results should be analyzed and used for placing students in classes on the basis of their individual strengths, weaknesses, and education needs but that he did not have the time to make such analyses because of other administrative responsibilities. Academic counseling was being performed by classroom teachers in some instances, but most of these teachers said that they did not have the time, training, or experience necessary to do the job effectively.

The accumulation and interpretation of standardized test results is one of the major functions of a counselor. Officials of the American Personnel and Guidance Association and of the Office of Education, told us that, ideally, professional counselors also should administer these tests because they have been specifically trained in this area. Although testing generally was being done at the 12 schools

we visited, the student's regular teachers, rather than counselors, administered the tests at eight of the schools and counselors were involved only to a limited degree in administering the test at a ninth school.

According to the American Personnel and Guidance Association, a counselor's student-appraisal function includes coordinating the accumulation, organization, and maintenance of files of pupil data, including standardized test results, academic and biographical records, personal data forms, and rating scales. We found, however, that counselors generally did not maintain such data. At one school having 800 students, the counselors developed files for only 11 students.

A BIA official told us that some efforts recently had been made to get counselors more involved in the broad range of professional counseling services but that these efforts were still in the early stage of development. For instance, in an experimental program which had been implemented at nine schools in the Navajo Area, the counselors no longer supervise dormitory operations but are responsible only for providing counseling services.

For BIA to provide the full range of professional counseling services to Indian children, the current qualification standards for counselors may have to be upgraded. BIA's academic standard to qualify for a position as a guidance counselor requires:

- Completion of a 4-year course of study leading to a bachelor's degree in any major.
- Completion of 24 semester hours in professional education, including 12 semester hours in guidance and psychology subjects directly related to education (not necessarily graduate work).

This academic standard is significantly below the academic standard established by the American Personnel and Guidance Association which recommends completion of a 2-year graduate program in the field of counselor education. According to a 1965 publication of the Office of Education, of 55 States and outlying areas, such as the Canal Zone and Guam, 46 required master's degrees, or other specified

amounts of graduate-level education, in the field of counseling for permanent certification as a school counselor and two required additional graduate-level education in the field of counseling beyond a master's degree. According to Office of Education officials, most States generally required 1 year of graduate-level education in the specific field of counseling and the trend was toward a 2-year graduate program.

Of the 78 counselors at the schools we visited, only 15 had master's degrees in the field of counseling and five had bachelor's degrees in counseling. The remaining 58 had degrees in such fields as education or social studies.

Need to obtain substitute teachers

Although officials at the 12 schools we visited told us that it was important to have substitute teachers to assume responsibility for classes when regular teachers were absent, only two of the schools had made what school officials considered to be adequate provisions for obtaining substitute teachers. At the 10 other schools, either no provision had been made for substitutes or the number of substitutes on call was insufficient, generally, according to the officials at these schools, because of personnel ceilings or lack of funds.

We reviewed leave records and other data at several schools to ascertain the extent of the need for substitute teachers. At two schools which had no substitute teachers, we found that, for 39 and 58 days, respectively, a regular teacher was absent for at least one half a day during the 180-day school year. These schools attempted to fill the vacancies with supervisory personnel or teacher-aides.

At another school four high school class periods had been without a teacher for about 2 months; students were used as monitors to keep order in these classes because the school's only substitute teacher was filling in for another teacher who was on extended sick leave.

At another school which had no substitute teachers, school officials said that an average of two teachers a day were absent and that the students were sent back to the dormitory when teachers were absent.

NEED TO IMPROVE
BIA'S MANAGEMENT INFORMATION SYSTEM

An effective management information system would seem essential in developing, implementing, and evaluating an educational program. Such a system could provide education program officials with the data they need for identifying the educational needs of students, both individually and collectively; for designing programs and activities for accomplishing the desired educational goals; for budgeting and allocating resources to support these programs; and for evaluating the costs and benefits of these programs in relation to the planned educational goals. BIA officials generally agreed that they did not have an effective management information system for providing such data.

Need for academic aptitude
and achievement data

Central office education officials stated that the results of standardized academic aptitude and achievement tests not only would be useful at the school level in identifying students' needs and measuring their progress but also would be needed by them in formulating and evaluating the results of programs designed to accomplish the goal of raising the academic-achievement level of Indian students to the national average.

BIA records did not contain sufficient information for determining the actual progress that had been made toward the accomplishment of this goal, nor did BIA have an overall student-testing program for obtaining such information. Education officials at each area office decided on the testing program to be followed by schools under their jurisdiction; however, test results were not compiled and evaluated at the central office. Outlined below is a brief comparison of the testing program followed in the three areas we visited.

Academic- achievement testing	Area		
	<u>Juneau</u>	<u>Phoenix</u>	<u>Navajo</u>
Grade levels to be tested each year	All grades	All grades	2d, 4th, 6th, and 8th grades
Time of year students are to be tested	Fall	Spring	Approximately midyear
Type of achievement tests that is to be used	Metropolitan for elementary grades and California for secondary grades	Either Metropolitan or California	Stanford
Is it required that results be submitted to the area office?	Yes	Yes	Yes
Academic- aptitude testing			
Is aptitude testing required?	No	Yes (7th grade only)	No

In a number of cases the established area testing program was not followed. For example, the Phoenix Area Office directed that academic-achievement tests be administered each spring to all students, that either the Metropolitan Achievement Test or the California Achievement Test be acceptable as long as one was used consistently, and that results be submitted to the area office. However:

- One school did not administer the spring academic-achievement tests for 3 years.
- Another school changed from the California Achievement Test to the Metropolitan Achievement Test and back to the California Achievement Test during a period of 4 years, which made it difficult to compare results from year to year.
- Area office education officials did not use test results for program planning and evaluation purposes.

The testing program established by the Juneau Area Office required that in the fall the Metropolitan Achievement Test be administered to students in kindergarten through

the eighth grade and that the California Achievement Test be administered to students in the ninth through the 12th grades. At one school, however:

- Kindergarten and first-grade students were not tested.
- The Metropolitan Achievement Test, rather than the California Achievement Test, was administered to the ninth-grade students.
- Students in the 10th through the 12th grades were not tested.

Although test results have not been compiled and evaluated at the central office, the value of a testing program has been recognized. Education officials at the central office advised us that they were in the process of developing a BIA-wide testing program.

Need for program-oriented financial management reports

The operating cost of the BIA school system for fiscal year 1971 was approximately \$118.6 million. We found, however, that central office education program officials did not know by whom or for what purposes these funds had been used.

Central office education program officials did not know how much of the \$118.6 million in operating costs had been incurred by each of BIA's 200 schools, 76 agency offices, and 11 area offices; nor did they receive any financial management reports which would readily provide this data. We found that they had not received financial management reports which would show how much of the operating cost had been incurred for such education activities as administration, curriculum development, instruction, pupil-personnel services, support services, and dormitory operations.

We were able to identify only one report which contained data on BIA program costs. This monthly "Report on Operating Budget" details both the programmed and the actual obligations and costs charged against the 24 BIA

programs. Education is the largest of these programs and accounts for about 50 percent of BIA's operating budget. The Deputy Director of Management Services confirmed that this was the only report which showed BIA's program costs.

Our examination of the "Report on Operating Budget" for the year ended June 30, 1971, which consisted of 3,000 pages of computer tabulations, showed that the \$118.6 million in operating costs was itemized by detailed costs on the basis of location codes. The education program costs were not totaled for each school, agency office, and area office, nor were costs summarized by the various education activities discussed above.

According to central office education program officials, they receive only that part of the "Report on Operating Budget" which shows the education program costs incurred by the central office.

One official commented that, even if the entire cost report were received, it could not be effectively used for program-management purposes because it was too voluminous and the data was not summarized into a program-oriented format. The BIA Director of Education Programs said that the limited financial management data made available to him was not adequate for such purposes as determining and evaluating the costs for each pupil of the various education activities or making cost-benefit analyses of education programs in BIA schools. He said that such information was essential for effective management of the BIA school system.

Our observations concerning the need for program-oriented financial management reports are similar to those reported in May 1971 by a special management assistance survey team, which was organized by the Office of Management and Budget at the request of the Secretary of the Interior. In reference to the various financial reports produced by the Indian Affairs Data Center, the survey team stated that:

"*** We found that operating officials at Central Office made very little use of these reports because they were too voluminous and because the officials were not familiar with the computer

language. No 'flash' or summary reports were prepared for use by the executive staff."

The survey team stated also that:

"*** We cannot over-emphasize the need for effective communication between the Division of Financial Management and its customers at all levels to bring about an effective reporting system."

We believe that, to effectively manage a program of the size and complexity of the BIA school system, the Director of Education Programs should receive program-oriented financial management reports which show for what purpose and by whom the financial resources are being used.

CHAPTER 3

CONCLUSIONS AND RECOMMENDATIONS

CONCLUSIONS

Improving the educational achievement level of Indian students appears to be one of the most important keys to overcoming the problems the Indians face. Information available at the schools we visited revealed relatively little evidence of progress.

Although BIA had established a goal of eliminating the disparity between educational achievement attained by Indian children and their non-Indian peers by 1976, it did not adequately communicate this goal to the operating levels nor did it develop and implement a specific plan of action by which it intended to raise Indian students' academic-achievement level. Certain constraints to improving academic achievement, such as English communication handicaps, were evident; yet established school programs did not deal with them completely and in some cases did not deal with them at all.

Considering the magnitude of the goal that was established by BIA and the obvious complexity of the problem, it appears that it is essential to have a well organized and managed program specifically designed to accomplish that goal. We believe that such a program should be formulated through a systematic analysis of (1) the program's goal and (2) the critical factors contributing to, or impeding effectiveness in, achieving that goal.

In view of the limited progress made to date in raising the academic-achievement level of Indian children to the national average, it may be necessary for BIA to evaluate the reasonableness of the 1976 target date. We believe, however, that, regardless of the target date which might be established, BIA will not achieve its goal unless the fundamental concepts of a sound management system are implemented.

We believe also that BIA should develop an effective management information system to assist the program manager in assessing the specific educational needs of the students,

in identifying the major problems that must be dealt with, in devising the specific strategy for overcoming these problems, in implementing an education program responsive to the students' needs, in measuring progress toward stated goals, and in assessing the effectiveness of each responsible level within the BIA school system in achieving the established educational goals. The system should provide for comprehensive and consistent data on the students' academic aptitude and achievement levels and program-oriented financial management reports.

RECOMMENDATIONS TO THE
SECRETARY OF THE INTERIOR

We recommend that the Department of the Interior require the Commissioner of Indian Affairs to:

- Clearly apprise all operating levels of the goal of reaching a level of academic achievement for Indian students equal to the national average and the date by which it is to be accomplished.
- Identify and assign priorities for dealing with all critical factors known to impede progress toward accomplishment of that goal.
- Develop a comprehensive educational program which is designed specifically to overcome the factors which impede progress in meeting the goal and which is flexible enough to meet the needs of students in all BIA-operated schools.
- Establish periodic milestones, such as the amount of improvement in the academic-achievement level necessary at the end of each successive year, to accomplish the established goal.
- Periodically evaluate program results on the basis of these predetermined milestones to allow redirections of effort as may be necessary.
- Develop a management information system providing:

1. Meaningful and comprehensive information on the academic aptitude and achievement levels of students in the BIA school system.
2. Program-oriented financial management reports geared toward the management needs of BIA education program officials.

MATTERS FOR CONSIDERATION BY THE CONGRESS

The Special Subcommittee on Indian Education, Senate Committee on Labor and Public Welfare, noted at the conclusion of its field investigation in 1969 that:

"One of the most serious problems encountered was the lack of meaningful information and statistics that could be provided by the BIA, the Agency of the Federal Government directly responsible for Federal Indian programs. Time after time the staff was faced with inadequate, incomplete or nonexistent information important to the conduct of such a study. One can only wonder how an agency with such a responsibility for so long a time can possibly determine the effectiveness of their own programs without having available--and without making the effort to compile it--basic information necessary to evaluation."

The Subcommittee stated in its report that the lack of reliable data meant that the Congress could not carry out its legislative oversight function and that monies could not be appropriated wisely nor could effective and responsible legislation be developed.

As discussed in chapter 2 of this report, the situation has not changed significantly since 1969. BIA still has not developed and implemented an information system which would provide the data needed for effective administration and management of the BIA school system.

In view of the concern which has been expressed by the President and by members of the Congress regarding the quality of Indian education, the Congress may wish to consider enacting legislation requiring BIA to furnish certain

specific information which the Congress could use to evaluate the progress being made in improving Indian education. Such information could include:

- A statement of BIA's educational goals and the criteria with which BIA plans to measure progress toward these goals.
- A comprehensive plan to accomplish these goals. Such a plan should identify the critical tasks that need to be performed to reach the established goals; should assign priorities; and should include estimates of the cost for required staffing, equipment, and facilities.
- An annual report comparing actual program results with the predetermined milestones on a BIA-wide basis, as well as summary statistical data on the results achieved at each BIA-operated school. Such a report should identify progress in critical areas, such as English communication skills, and should compare progress in these areas to overall student progress. The reasons for, and the proposed solutions to, any significant shortcomings also should be explained in the report.

CHAPTER 4

AGENCY COMMENTS AND GAO EVALUATION

The Department of the Interior, in commenting on a draft of this report in a letter dated March 16, 1972 (see app. I), stated that the Department was generally in accord with the report findings and that it expected that the conclusions and recommendations would constructively support BIA's efforts to improve its education program.

The Department stated also that when making

"*** an evaluation of the program it would be impossible for a correct analogy to be concluded on the results of tests conducted the previous year against future program plans."

The Department stated further that programs could not be conclusively evaluated within such an immediate time frame and that it would be normal to expect that, in a program of the magnitude of BIA's educational endeavor, from 5 to 10 years would be required to statistically prove any increased effectiveness through student test results. The Department noted that we had not given due cognizance to departmental and congressional commitments and efforts to improve educational opportunity for the American Indian.

We recognize the problems associated with using the results of tests conducted the previous year in evaluating the effectiveness of BIA's current and future programs. As discussed in chapter 2, BIA does not have an adequate system, however, for measuring the progress of students and for evaluating the effectiveness of its educational program in meeting its established goals. We agree that it would have been desirable to obtain student academic-achievement data covering several years. Such data was not available, however, and, by necessity, our evaluation of progress in meeting BIA's education goals was limited to the data which was available in the schools we visited. Therefore we had no meaningful basis for giving recognition to the various commitments and efforts to improve educational opportunity for Indians, including the quality of that education. One of the

key issues discussed in this report is the need for a management information system which, we believe, is essential for evaluating the effectiveness of BIA's education program.

The Department stated that it would respond directly to the Subcommittee on Indian Affairs, Senate Committee on Interior and Insular Affairs, concerning the matters discussed in chapter 2. The Department's comments on our recommendations to the Secretary of the Interior are discussed below.

The Department did not indicate what action would be taken to apprise all operating levels of the goal of reaching a level of academic achievement equal to the national average and the date by which it was to be accomplished. The Department stated that a task force had been established in March 1971 to review the goals and objectives of BIA's education program and the necessary organizational changes to achieve them.

The Department outlined a number of steps to be implemented in fiscal year 1973 for assigning priorities for dealing with all critical factors known to impede progress toward accomplishment of its goal. We believe that effective implementation of these steps will assist BIA in strengthening its education program.

The Department's reply was not fully responsive to our recommendation that BIA develop a comprehensive education program specifically designed to meet the needs of all students in BIA schools. The Department stated that Indian students attending BIA schools were geographically isolated, had atypical social conditions in their homes, or had emotional or economic problems which could not be handled in a traditional school setting. The Department also noted that first attention must be given to compensatory activities which would enable the child to function in a school environment, and that emphasis on the special needs of the students must continue as a prime goal, together with efforts directed toward academic achievement.

One of the key issues in this report is that, although BIA has known for years that most Indian children in BIA schools require some form of special or compensatory

education, its education program has not been designed to fully meet these needs. BIA has not established a systematic means of determining the special and compensatory needs of its students.

The Department stated that specific actions were being taken to upgrade the ability of school personnel to deal with the special nature of the students served. These actions should help to improve the quality of BIA's education program, provided that appropriate action is taken by BIA to ensure that the special needs of all students are identified and met.

Concerning our recommendations for establishing periodic milestones--such as the amount of improvement in the academic-achievement level necessary at the end of each successive year to accomplish the established goal--and for making periodic evaluations of results, the Department stated that these exercises were impractical since the BIA goal must be tempered by the reality of Indian self-determination, the special nature of the students served, and the availability of funds.

We disagree that it is impractical to establish milestones and evaluate program results, particularly in an education program. We believe that, regardless of the goal or goals established for Indian education, effective management requires the development of an appropriate strategy for meeting established goals and the periodic evaluation of progress toward meeting these goals.

Concerning our recommendation for development of an education management information system, the Department stated that BIA would work with all levels of school management to design and implement a system which would incorporate existing data and interrelate it with data collected about pupils, property, program, and community and that the output from the information system would be custom designed to meet the requirements of all users of BIA educational information. We believe that effective use of information to be provided by the proposed system should assist BIA in managing its schools.

CHAPTER 5

SCOPE OF REVIEW

Our review was directed toward evaluating the effectiveness of the management methods followed by BIA in its efforts to improve the quality of Indian education and to raise the academic-achievement level of Indian children up to the national average by a specified date.

The work was done primarily at BIA's central office in Washington, D.C.; at BIA's Navajo, Phoenix, and Juneau Area Offices located in Window Rock and Phoenix, Arizona, and Juneau, Alaska, respectively; and at 12 BIA schools under the jurisdiction of these area offices. Although BIA has a total of 11 area offices, the three included in our review were responsible for schools having about 64 percent of the total BIA school enrollment. The 12 schools visited accounted for about 17 percent of the total BIA school enrollment and included four off-reservation secondary boarding schools, one on-reservation secondary boarding school, four on-reservation elementary boarding schools, two on-reservation elementary day schools, and one combined elementary and secondary day school.

We reviewed the applicable policies, regulations, procedures, and practices pertaining to administration of BIA's school system at the central office, area and agency offices, and school levels. We examined pertinent records, reports, and documents and interviewed BIA officials, tribal leaders, school administrators, teachers, and counselors concerning the problems and issues of Indian education. We examined also a number of studies and research projects dealing with Indian education.

Those issues in this report which are of an educational nature were discussed with professional educators at BIA, the Office of Education, the American Personnel and Guidance Association, Northern Arizona University's College of Education, and the Office of the Los Angeles County Superintendent of Schools.



United States Department of the Interior

APPENDIX I

OFFICE OF THE SECRETARY
WASHINGTON, D.C. 20240

MAR 16 1972

Mr. Max Hirschhorn
Associate Director
Civil Division
U.S. General Accounting Office
Washington, D.C. 20548

Dear Mr. Hirschhorn:

The Department of the Interior has reviewed with interest your draft report, "Opportunity to Improve Indian Education in Schools Operated by the Bureau of Indian Affairs, Department of the Interior," and are generally in accord with its findings. We expect that its conclusions and recommendations will constructively support the Bureau's efforts to improve its education program. We concur that the draft report reflects the program levels as of the date the material was initially collected, July 1971. When taking an evaluation of the program it would be impossible for a correct analogy to be concluded on the results of tests conducted the previous year against future program plans. Our concern is that the programs cannot be conclusively evaluated within such an immediate timeframe. It would be normal to expect that in a program of the magnitude of the Bureau's educational endeavor that from five to ten years would be required to statistically prove any increased effectiveness through student test results. We believe the GAO has not given due cognizance to the Departmental and Congressional commitments and efforts to continue to improve the educational opportunity for the American Indian.

Recommendations or suggestions

1. "The Commissioner of Indian Affairs should clearly apprise all operating levels of the goal of reaching a level of academic achievement for Indians equal to the national average and the date by which it is to be accomplished."

In March 1971 a task force was established to review the goals and objectives of the Bureau's Indian Education Programs and the necessary organizational changes to achieve them. The funding necessary to carry out these specific programs is planned for FY 1973. The goal for academic achievements for Indian students was developed in 1963. The goal of bringing Indian high school graduates to a level equal to the National average by 1976 is probably too optimistic but remains our commitment.

2. "Identify and assign priorities to all critical factors which are known to impede progress toward accomplishment of that goal."

As part of our major program thrust in the projected plans for FY 1973, we have identified and assigned priorities as follows:

- a. To measure growth of pupils individually and in groups;

APPENDIX I

- b. To compare growth of individuals and groups with other reference groups;
- c. To obtain clues for curriculum adaptation and improvement;
- d. To help students plan for education and vocational goals;
- e. To assist in grouping, scheduling, and programming;
- f. To help educators plan for individual or group needs; and
- g. To diagnose difficulties so remedial work can be planned.

Although the above priorities have been identified and assigned, we would caution against absolute reliance on the results, since recent information indicates that many of the measurement instruments currently available are culturally biased and do not reflect accurately student development and achievement.

3. "Develop a comprehensive educational program which is specifically designed to overcome the factors which impede progress in meeting the goal, and which is flexible enough to meet the needs of students in all of BIA's schools."

The enrollment pattern of Bureau-operated schools is of a special nature. About three-fourths of the Indian students living on reservations attend public schools. The Bureau-operated schools serve the one-quarter who are the most geographically isolated or have atypical social conditions in the home or have emotional or economic problems which cannot be handled in a traditional school setting. First attention, then, must be given to compensatory activities which will enable the child to function in a school environment. This emphasis on the special needs of the students must continue as a prime goal, together with efforts directed toward academic achievement.

In this regard, specific actions are now being taken which will effect an overall upgrading of the ability of school personnel to deal with the special nature of the students served. Upgrading of academic achievement may be expected.

4. "Establish periodic milestones, such as the amount of improvement in academic achievement level necessary at the end of each successive year of the program to accomplish the established goal."

We feel that at this juncture in a changing educational program emphasis this goal must be tempered by the reality of Indian self-determination, the special nature of the students served, as well as the availability of funds all of which greatly complicate the situation and make this exercise impractical.

5. "Periodically evaluate program results based on these predetermined milestones to allow timely redirections of effort as may be necessary."

See above.

APPENDIX I

6. "Develop a management information system providing (a) meaningful and comprehensive information on the academic aptitude and achievement level of students in the BIA school system. (b) Program-oriented financial management reports, geared toward the management needs of BIA education program officials."

Our approach for developing an educational management information system for the Bureau of Indian Affairs is, working with all levels of school management, to design and implement a system which will take advantage of the data existing as a result of the present operating procedures for schools, and interrelate these files with data collected about pupils, property, program, and community. The "output" from such an information system will be custom designed to meet the requirements of all users of BIA educational information.

Specifically, it is anticipated that the following activities will be undertaken:

- a. Financial Management System--The Office of Education Programs has requested a restructure of assigned cost feature account codes. The necessary software changes should be completed during FY 1972.
- b. Pupil Accounting System--Permanent student records should be completed on every BIA student and on file in the Data Center. Pilot work on this project will be completed before the end of the 1973 Fiscal Year and student data should be available to users on a predetermined and scheduled basis.
- c. Staff or Personnel System--Much work has already been done in this area. By FY 1974 the few additional items required by Education about teachers should be completed.
- d. Curriculum or Program Information--This is the common denominator or the linkage which will eventually pull all files together for the Educational Information System. The key to the establishment of this file is the development and acceptance of standard terms and definitions about curriculum and program. Once the terms have been defined, the other files should be updated with specific assignments of courses by teachers and specific courses completed by students.
- e. During the 1974 Fiscal Year there will be an increasing need for IADC services in the area of test scoring and analysis. The measurement of student achievement has been described as a priority program need for years. A special task force report will describe the services required.

APPENDIX I

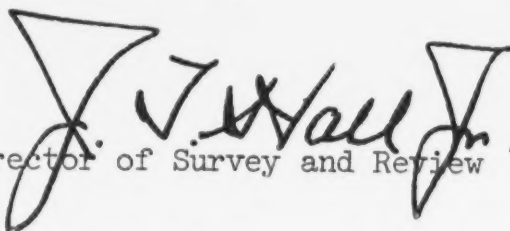
Due to the limited time allowed in reviewing the draft report and the discussion evolving with the members of the Senate Subcommittee on Indian Affairs of the Committee on Interior and Insular Affairs during the hearing on the Comprehensive Indian Education Act of 1972 regarding your draft report, we will respond directly to the Subcommittee concerning the specifics in your Chapter 2.

Secretary Loesch in testifying during those hearings stated: "Much has been written and said of the educational deficits of Indian Americans. Less has been written or said, however, about the rather substantial progress which has taken place during the past ten to twenty years."

"It seems possible that the dismal picture which has been put forward has reached a point of being counterproductive so far as the morale of the Indian peoples is concerned. This is also true of the morale of the many dedicated people serving them in schools of all types."

We suggest that in developing the final report that adequate note be made of the positive elements of the Bureau's Indian Education programs be included to place the problems in context.

Sincerely yours,


Director of Survey and Review

APPENDIX II

PRINCIPAL OFFICIALS OF THE DEPARTMENT OF THE INTERIOR RESPONSIBLE FOR ADMINISTRATION OF ACTIVITIES DISCUSSED IN THIS REPORT

	Tenure of office	
	<u>From</u>	<u>To</u>
SECRETARY OF THE INTERIOR:		
Rogers C. B. Morton	Jan. 1971	Present
Fred J. Russell (acting)	Nov. 1970	Dec. 1970
Walter J. Hickel	Jan. 1969	Nov. 1970
Stewart L. Udall	Jan. 1961	Jan. 1969
ASSISTANT SECRETARY FOR PUBLIC LAND MANAGEMENT:		
Harrison Loesch	Apr. 1969	Present
Vacant	Jan. 1969	Apr. 1969
Harry R. Anderson	July 1965	Jan. 1969
DEPUTY ASSISTANT SECRETARY FOR INDIAN AFFAIRS:		
William L. Rogers	June 1971	Present
COMMISSIONER OF INDIAN AFFAIRS:		
Louis R. Bruce	Aug. 1969	Present
T. W. Taylor (acting)	June 1969	Aug. 1969
Robert L. Bennett	Apr. 1966	May 1969
Philleo Nash	Sept. 1961	Mar. 1966